

Code of Business Ethics and Conduct

Dated: December 2018

TDI Sustainability's (TDI) Code of Business Ethics and Conduct (the Code) is intended to affirm our commitment to fundamental responsible practices in business and to guide our employees, managers and directors on how to conduct the company's activities. Respecting the law and avoiding legal violations are essential tenets of the Code. TDI provides a baseline for behaviour and legal compliance is the minimum that is required. However, in most circumstances our standards go beyond legal requirements. The Code includes our stand on legal compliance, how we treat each other in the workplace, corruption, transparency and disclosure, and the integrity of our work.

Legal Compliance: We conduct all our activities in strict compliance with the national laws of the countries where we operate and with all relevant international conventions where those are applicable in the country of operation. It is the responsibility of our directors, officers and managers to know and keep abreast of changes to laws and regulations that affect our business. We maintain a database of relevant laws and regulations affecting our business.

Our People: We forbid child and forced labour. We aim to ensure equal treatment of all our employees, based on merit and performance. We value our employees and the commitment they have made to TDI, and we take seriously the investment the company has made in them. We ensure employees are informed and trained in order that they may carry out their duties effectively, safely and securely. We endeavour to have an enjoyable work place and as such expect our people to treat each other with respect.

Non-Discrimination: We do not discriminate employees on the basis of race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age.

Anti-Slavery and Human Trafficking: TDI has a zero-tolerance approach to Human Trafficking and acts of Slavery from occurring within our business. We operate a strict procurement process and conduct due-diligence to ensure suppliers conform to all applicable laws and regulations, including those relating to the Modern Slavery Act 2015. Our recruitment and procurement due-diligence procedures detail the steps we take to identify and to mitigate the risks of slavery occurring in our business and supply chain.

Human Rights: TDI is committed to ensure all human rights are upheld in line with the UK Government Foreign & Commonwealth Office and Government Equalities Office policies on Human Rights; the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights regarding all employees and any other people who interact with TDI.

We have developed internal management systems to ensure respect for international standards of human rights. TDI ensures any incidents of non-compliance with international standards of human rights are investigated and addressed in an appropriate manner without

compromising the confidentiality or placing at risk any individuals or groups involved. Employees found to be in breach of any of our policies could face disciplinary proceedings.

We treat all employees with dignity and respect. We will not use any means of violence, sexual abuse, sexual harassment, corporal punishment, physical or verbal abuse towards employees

Collective Bargaining: We recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the UK Advisory, Conciliation and Arbitration Service (ACAS).

Working Hours and Overtime: TDI complies with the UK Government Work and Pensions Department regarding minimum wages, standard working hours and employee benefits. Overtime is voluntary and compensated in full at rates in compliance with local law.

Health and Safety: We are committed to a safe and healthy workplace and incorporating health and safety into organizational culture for our employees by working to the highest international standards. Most of our employees are desk-based and working remotely.

Personnel Security: We provide security briefings to our personnel and contractors travelling in locations which are noted as high risk by the UK Foreign and Commonwealth Office .

It is the duty of management to ensure all processes and operating systems have undergone health and safety risk assessments, are properly supervised at all times, and are designed and managed to enable employees to raise and be consulted upon issues of health and safety at any time.

It is the responsibility of all employees and contractors to co-operate to enable all statutory duties to be complied with and employees must ensure their own health and safety at work and the health and safety of anyone else who might be affected by their behaviour.

Whistleblowing: TDI is committed to ensuring no employee should be dismissed or penalised by TDI for disclosing serious concerns related to TDI or their employment with the organisation.

Conflicts of Interest:

Corruption: We are fully aware that corruption is a persistent issue in many countries. We do not tolerate bribery or facilitation payments of any kind. We routinely assess which business activities are most susceptible to corruption and encourage and support our employees to report any incidence that might lead to or be perceived as corrupt and train our managers to respond appropriately.

Money laundering: Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds

appear to have derived from legitimate origins or constitute legitimate assets. Generally, money laundering occurs in three stages. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses.

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal either the origin of the funds or their intended use, which could be for criminal purposes. Legitimate sources of funds are a key difference between terrorist financiers and traditional criminal organizations. In addition to charitable donations, legitimate sources include foreign government sponsors, business ownership and personal employment. Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same as or similar to methods used by other criminals to launder funds. Funding for terrorist attacks does not always require large sums of money and the associated transactions may not be complex.

For further info please refer to TDI's other policies:

- Anti Bribery and Gifting Policy
- Conflict of Interest Policy
- Data Protection Policy
- Environmental and Sustainability Policy
- Equal Opportunities Policy
- Grievance Policy
- Recruitment and Vetting Policy
- Safeguarding Policy
- Whistleblowing Policy